

Michael F. Ram (SBN 104805)
mram@forthepeople.com
MORGAN & MORGAN
COMPLEX LITIGATION GROUP
711 Van Ness Avenue, Suite 500
San Francisco, CA 94102
Telephone: (415) 358-6913
Facsimile: (415) 358-6293

Attorneys for Plaintiff
[Additional Attorneys for Plaintiff in Signature]

Elizabeth L. Schilken (SBN 241231)
SchilkenE@ballardspahr.com
BALLARD SPAHR LLP
2029 Century Park East, Suite 1400
Los Angeles, CA 90067-2915
Telephone: (424) 204-4400
Facsimile: (424) 204-4350

Attorneys for Defendant
[Additional Attorneys for Defendant in Signature]

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ODETTE R. BATIS, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

DUN & BRADSTREET HOLDINGS, INC.,

Defendant.

Case No. 22-cv-01924-MMC

**STIPULATED REQUEST FOR ORDER
TO EXTEND FACT DISCOVERY
DEADLINE; ORDER GRANTING
STIPULATION**

Complaint Filed: March 25, 2022

Pursuant to Local Rule 6-2, Plaintiff Odette R. Batis (“Plaintiff”) and Defendant Dun & Bradstreet Holdings, Inc. (“Defendant”) (collectively, the “Parties”), by and through their respective counsel, hereby submit this stipulated request to extend the fact discovery deadline by an additional four weeks—from July 31, 2025 to August 28, 2025—to accommodate Plaintiff’s request for additional time to potentially pursue additional fact discovery following the Rule 30(b)(6) depositions of two witnesses for Defendant. In support of this stipulation, the Parties state as follows:

1. Plaintiff filed her Complaint on March 25, 2022. Dkt. 1.
2. Plaintiff served her Rule 30(b)(6) deposition notice on December 26, 2024, and after meeting and conferring with Defendant about the topics in that notice on February 13, 2025, Plaintiff served amended topics on February 14, 2025.
3. Plaintiff served Rule 30(b)(1) deposition notices for the Rule 30(b)(6) designees on December 26, 2024 and April 25, 2025.
4. Fact discovery is currently set to close on July 31, 2025. Dkt. 81.
5. Defendant’s witnesses – who were both noticed pursuant to Rule 30(b)(6) and Rule 30(b)(1) – are scheduled for depositions on July 17 and July 23 (the “July Depositions”).
6. Plaintiff has concerns that she will not have sufficient time prior to the close of fact discovery if there is additional fact discovery she wants to pursue following the July Depositions.
7. In that regard, the parties agree to a four-week extension of the fact discovery deadline to allow Plaintiff to pursue additional fact discovery arising from the July Depositions.
8. This is the seventh stipulated request in this case and the first request to extend the fact discovery deadline.
9. No other case deadlines will be impacted. Dkt. 81.

THEREFORE, the Parties respectfully request that this Court extend the deadline for the close of fact discovery from July 31, 2025, to August 28, 2025.

1 Dated: May 21, 2025

Dated: May 21, 2025

2 /s/ Brittany Resch

/s/ Ashley I. Kissinger

3 Brittany Resch (*pro hac vice*)
4 STRAUSS BORRELLI PLLC
5 980 North Michigan Ave Suite 1610
6 Chicago Illinois 60611
7 Telephone: (872) 263-1100
8 bresch@straussborrelli.com

Ashley I. Kissinger
BALLARD SPAHR LLP
1225 17th Street, Suite 2300
Denver, CO 80203-5596
Telephone: (303) 376-2407
Facsimile: (303) 296-3956
kissingera@ballardspahr.com

9 Michael Francis Ram
10 Marie Noel Appel
11 MORGAN & MORGAN
12 Complex Litigation Group
13 711 Van Ness Avenue, Suite 500
14 San Francisco, CA 94102
15 Telephone: (415) 358-6913
16 Facsimile: (415) 358-6923
17 MRam@forthepeople.com
18 mappel@forthepeople.com

Elizabeth L. Schilken
BALLARD SPAHR LLP
2029 Century Park East, Suite 1400
Los Angeles, CA 90067
Telephone: (424) 204-4371
Facsimile: (424) 204-4350
schilkene@ballardspahr.com

Michael R. O'Donnell (*pro hac vice*)
RIKER DANZIG LLP
One Speedwell Avenue
Morristown, NJ 07962
Telephone: (973) 451-8476
Facsimile: (973) 451-8700
modonnell@riker.com

Benjamin Ross Osborn
LAW OFFICE OF BENJAMIN R.
OSBORN
63 Fiddlers Elbow Rd.
Margaretville, NY 12455
Telephone: (347) 645-0464
ben@benosbornlaw.com

19
20 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

21
22
23 May 22, 2025

24 Dated


Honorable Maxine M. Chesney
Senior United States District Judge

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i), I hereby attest that concurrence in the filing of this document has been obtained from each of the other Signatories.

Dated: May 21, 2025

/s/ Brittany Resch

Brittany Resch

CERTIFICATE OF SERVICE

I, Brittany Resch, hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record via the ECF system.

DATED this 22nd day of May, 2025.

STRAUSS BORRELLI PLLC

By: /s/ Brittany Resch
Brittany Resch
bresch@straussborrelli.com
STRAUSS BORRELLI PLLC
One Magnificent Mile
980 N Michigan Avenue, Suite 1610
Chicago IL, 60611
Telephone: (872) 263-1100
Facsimile: (872) 263-1109